

# EXHIBIT D

**From:** Brooke Alexander <[balexander@BSFLLP.com](mailto:balexander@BSFLLP.com)>

**Sent:** Thursday, October 5, 2023 5:54 PM

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**Subject:** RE: Discovery Questions

[EXTERNAL EMAIL from [balexander@bsfllp.com](mailto:balexander@bsfllp.com)]

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Val,

As Mike stated, I write to confirm that, with the two additional productions you will receive tonight, Plaintiff will have substantially completed production as to those documents that it has agreed to produce to date.

We are generally available to meet and confer on all outstanding issues, including selecting a date for the exchange of privilege logs, in the afternoons next week, Tuesday through Friday. Please propose a few dates and times that work for your team. We will endeavor to provide updated hit reports per your request before that time.

With respect to Mr. Chagoya, Servicios Funerarios does not control him or his documents. Servicios Funerarios has no agreement with Mr. Chagoya that gives it the power to compel his participation. If AIC and its counsel choose to contact him, we caution you that in the course of his work with Servicios Funerarios he received information that is protected by the attorney-client or other applicable privileges and that any communication with him should steer clear of this information. We suggest that acquiring Mr. Chagoya's testimony and documents by way of Letters Rogatory, as AIC has started to do, is the better way to proceed.

Best,

Brooke

**Brooke A. Alexander**  
Partner

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